

## Talking Points for the February 27 Azarga Meeting

### Background Information:

Post-restoration monitoring requirements: In comments submitted to the EPA on the Class III permit, Azarga proposed groundwater modeling as an alternative method for demonstrating no ISR contaminants will cross the AE boundary into the underground source of drinking water. Azarga referenced the NRC's process for approving an alternative concentration limit (ACL) for groundwater restoration within an ISR wellfield as supporting documentation for this approach. The UIC program is

## Ex. 5 Deliberative Process (DP)

Well 16 (FYI in case Powertech raises the issue): Well 16 is the abandoned drinking water well located inside the proposed Dewey-Burdock AE boundary.

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1) the well is now classified as a stock watering well, 2) the well is disconnected from the house at the site, and 3) Azarga is currently supplying the residence with drinking water and intends continue doing so in the future. The EPA classified well 16 as a drinking water well in the Dewey-Burdock proposed AE Record of Decision (ROD) document. The basis for the concern is South Dakota regulations identify stock watering as a use under the regulatory definition of domestic well.

In comments submitted during the public comment period, Azarga disagreed with the EPA's classification of well 16 as a drinking water well. The EPA further researched South Dakota regulations and identified that reclassifying the well as a monitoring well would remove it from classification as a domestic well.

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### Talking Points:

- Thank you for making time for the two technical calls you have had with Valois and Douglas. From our perspective, those have been productive conversations to help clarify the comments you submitted and answer questions we had about them.

- For the Class III and Class V permits, we don't have any outstanding questions for you at this time. Our next step is to review NRC reference documents in order to evaluate the ACL approval process to determine how or whether the groundwater modeling NRC requires could be used in the context of the Class III draft permit. We will be scheduling a call with NRC in the next month to discuss their process.
- We also have staff with Air Program and Hydrogeology expertise reviewing comments you submitted on the Cumulative Effects Analysis. We anticipate they will conclude their reviews in the next month, so we may have questions for you at that time on those particular comments.
- For the Endangered Species Analysis and Cumulative Effect Analysis document, I understand you suggested there may be some requirements in the updated information you submitted for the NRC license that we could use for our analysis, and that you are going to locate those specific documents for Valois. Thank you for sharing that information with us to help possibly expedite that part of this project.
- Lastly, I know Valois discussed with you the process we need to follow if we make changes to the proposed aquifer exemption boundary. I understand that you are going to get back to us to clarify your final aquifer exemption request and any required supporting information.